

EXHIBIT L

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, THOMAS BAKER and JOHN
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a ELI MOSELY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS, LEAGUE
OF THE SOUTH, JEFF SCHOEPP, NATIONAL
SOCIALIST MOVEMENT, NATIONALIST
FRONT, AUGUSTUS SOL INVICTUS,
FRATERNAL ORDER OF THE ALT-
KNIGHTS, LOYAL WHITE KNIGHTS OF THE
KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3: 17-cv-00072-NKM

**DECLARATION OF MARISSA BLAIR IN SUPPORT OF PLAINTIFFS’ SUBMISSION
REGARDING VENUE FOR TRIAL AND TRIAL LOGISTICS**

I, Marissa Blair, declare as follows:

1. I am a Plaintiff in the lawsuit captioned *Sines v. Kessler*, No. No. 3: 17-cv-00072-NKM.
2. I provide this declaration in support of Plaintiffs' Submission Regarding Venue for Trial and Trial Logistics.
3. The statements made in this declaration are based on my personal knowledge. If called to testify, I could and would testify under oath competently and truthfully to each of the statements in this declaration.
4. I am a resident of Charlottesville, Virginia. I have lived in Charlottesville, Virginia since March 2019.
5. I am employed as a contract negotiator in the legal department of S&P Global, which maintains an office in Charlottesville. While I am currently working remotely due to the COVID-19 pandemic, I anticipate returning to S&P Global's office in Charlottesville now that restrictions are being lifted. It would be extremely difficult for me to work for prolonged periods without the resources available at my home or office, including multiple monitors.
6. In addition, I assist in providing elder care to my grandmother, who has a number of serious health conditions and resides in Nelson County. I drive my grandmother to and from medical appointments when my mother is unable to do so. Travelling to Lynchburg or Roanoke would prevent me from providing critical care for my grandmother if needed.
7. Travel to Lynchburg or Roanoke also would be difficult for me based on the substantial commuting costs I would incur. It would also be extremely burdensome for me to pay for lodging in Lynchburg or Roanoke, and I do not have any family or friends in either city with whom I could stay.

8. It also would be very difficult for me emotionally if the trial occurred in Lynchburg or Roanoke. In Charlottesville, I have connections and people that are willing to support me. People within the Charlottesville community have supported me in the past, and it makes it much easier knowing that members of the community will be there again with that support. I have a greater sense of security in Charlottesville, and it would be comforting to be able to return to my home every night. The trial process will be incredibly stressful as it is, and being in an unfamiliar location would only heighten that level of stress.

9. It is also important to me that the trial occur in Charlottesville because the events in question happened here, and it is important to have this case adjudicated in the Charlottesville community. Those events impacted and permanently changed the Charlottesville community. The Charlottesville community should be allowed to evaluate the impact of those events and determine who is responsible for the events of August 2017.

10. It is substantially more convenient for me, given my employment and personal responsibilities and the significant monetary costs I would incur in commuting and lodging, for trial in *Sines v. Kessler* to be held in Charlottesville. Removing the trial from Charlottesville would also cause me additional emotional stress through the loss of my community support network and would cause me to feel less safe.

11. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 10, 2021 in Charlottesville, Virginia.



Marissa Blair